

## (Caption of Case)

Request for Rate Relief to South Carolina Electric and  
Gas Company's Rates Pursuant to S.C. Code Ann. §  
58-27-920

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2017 - 305 - E

(Please type or print)

Submitted by: Stephanie U. EatonSC Bar Number: 80073Address: 110 Oakwood Drive, Suite 500Telephone: 336.631.1062Winston-Salem, NC 27103Fax: 336.725.4476

Other: \_\_\_\_\_

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other: \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

October 5, 2017

**Via SCPSC E-FILING DMS**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

**Re: Request for Rate Relief to South Carolina Electric and Gas Company's Rates Pursuant  
to S.C. Code Ann. § 58-27-920  
Docket No. 2017-305-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene on behalf of Wal-Mart Stores East, LP, and Sam's East, Inc. (together, "Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton  
(SC Bar No. 80073)

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Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

SUE/sds  
Attachments  
c: Certificate of Service

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2017-305-E

IN RE: Request of the South Carolina Office of Regulatory Staff for Rate Relief to South Carolina Electric and Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920	) ) ) )	<b>PETITION TO INTERVENE OF          WAL-MART STORES EAST, LP          AND SAM'S EAST, INC.</b>
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Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On September 26, 2017, the South Carolina Office of Regulatory Staff ("ORS") filed a Request for Rate Relief to South Carolina Electric & Gas Company ("SCE&G") Rates ("Request") with the Commission. In the Request, ORS asks the Commission to issue an order for SCE&G to immediately suspend collection of all revised rates under the Base Load Review Act ("BLRA"). Additionally, the ORS requests that if the BLRA is amended, revoked, or declared unconstitutional, the Commission order SCE&G to cease and desist from collecting revised rates and credit future bills or make refunds to customers for prior revised rate collections. ORS Request, pp. 1-2.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10<sup>th</sup> Street, Bentonville, AR 72716-0550.

3. Walmart is a large commercial customer of SCE&G. Walmart has approximately

35 facilities in South Carolina that are served by SCE&G, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 140 million kWh annually from SCE&G. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to SCE&G's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from SCE&G pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Brandfass be added jointly to the service list as Walmart may seek Mr. Williamson's and Ms. Brandfass' admissions to appear before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed as no intervention deadline has yet been set.

**WHEREFORE**, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully request that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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*Counsel to Wal-Mart Stores East, LP, and Sam's East, Inc.*

Dated: October 5, 2017



STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2017-305-E

IN RE: Request of the South Carolina Office )  
of Regulatory Staff for Rate Relief to South )  
Carolina Electric and Gas Company's Rates )  
Pursuant to S.C. Code Ann. § 58-27-920 )

**CERTIFICATE OF SERVICE**

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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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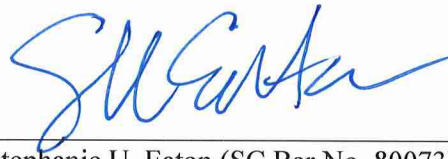
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Dated: October 5, 2017